



**MCI Communications  
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MAR 28 1997

Federal Communications Commission  
Office of Secretary

March 28, 1997

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket No. 96-262

Dear Mr. Caton:

On Friday, March 28, 1997, Nate Davis, MCI's Chief Financial Officer, Sally McMahon (MCI), Paul Barrett (MCI), Brad Stillman (MCI), Michael Pelcovits (MCI), and I met with Jim Casserly, Senior Legal Advisor to Commissioner Ness, Dan Gonzalez Legal Advisor to Commissioner Chong, and Jim Coltharp, Special Counsel to Commissioner Quello. The purpose of the meeting was to discuss MCI's positions with respect to a market-based approach to access charge reform as filed in MCI's comments in the above captioned proceeding. The attached document was used during the meeting and briefly outlines the issues discussed.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Kimberly M. Kirby

Attachment

cc: Jim Casserly (letter only)  
Jim Coltharp (letter only)  
Dan Gonzalez (letter only)

No. of Copies rec'd  
List ABCDE

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**PRACTICAL PROBLEMS WITH A  
MARKET-BASED APPROACH TO  
ACCESS CHARGE REFORM  
*OSS: A Case Study***

**MCI Communications Corporation  
March 28, 1997**



# **Structural Problems With Market-Based Approach**

- Terminating
- Misplaced Reliance On UNEs
  - OSS/NRCs
  - Unbundling
  - Interim rates

# **Operational Support Systems ("OSS") Are Important...**

- In Order For New Entrants To Provide Local Service They Must be Able To Process Large Volumes Of Orders In A Quick, Reliable, and Efficient Way -- Just Like The Long Distance Industry



# **What Are Operational Support Systems?**

Computer Systems Between New Entrants And Monopoly Local Phone Companies That Allow For

## **■ Quick, Reliable, And Efficient ...**

- Pre-Ordering
- Ordering
- Provisioning
- Billing
- Problem Detection And Resolution

... So That Customers Are Provided With Quality Local Phone Service From Any Company They Choose



# Illustration Of Step One: Preordering

- Must provide real-time information to customer during sales or service call
- Critical for accurate and timely install
- Happens instantaneously when sale is completed
- Number Reservation
- Feature Availability (by end-office)
- Address validation for e911
- Directory Listing information
- Select due date and schedule outside work
- Customer Service Record
- Telephone number's trouble history
- IXC availability for Equal Access
- DID trunk inquiry
- Block of direct inward dial numbers inquiry
- Unbundled network element service provider



# **Current Processes Are Unreliable, Slow, and Inconsistent**

- **PacBell Order Process Time Frame**
  - The Contract Says 3 Days
  - Reality is...Average is 3 Weeks: 3 Months Not Uncommon
- **Customers Lose Basic Service When Migrating To MCI (SNET, PacBell)**
- **Billing Test Errors With NYNEX**
  - Over Three Months To Resolve
- **Lack Of USW Reporting Prohibited Quick Resolution Of Network Blockage**
- **Improvement In Delays With Ameritech Resale Implementation Required Daily MCI Management**
- **BA Failure To Provide Correct NXX Codes Results In Customer Unable To Complete Calls**



# **Existing Operational Support Systems Focus On Resale**

<b>Resale</b>	<b>Interim Number Portability</b>	<b>Permanent Number Portability</b>
<b>Directory Assistance</b>	<b>Directory Listings</b>	<b>Interconnection</b>
<b>Unbundled Ports</b>	<b>Unbundled Loops</b>	<b>Network Platform</b>



# **ILECs Not Working To Get It Right**

- **SWBT Refuses To Share Documentation Until Contract Complete**
- **BST Refuses To Demonstrate Systems Until Contract Complete**
- **Bell Atlantic Refuses To Process Resale Orders Without Interim Test Agreement**
- **RBOCs Refuse To Follow Industry Standards**
  - **PIC Processing**
  - **Order Processing (SWBT)**
  - **Billing (Ameritech)**



# **We Know Operational Support Systems Are Working When:**

- Easy, Quick Ordering Of Any Service
- Prompt Installation of Service And Features
- Timely, Accurate Billing
- Quality Customer Service
- Accommodates Large Volume Of Orders

